

Message Text

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51

ACTION EB-11

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TO SECSTATE WASHDC 4013

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E.O. 11652: N/A

TAGS: EFIN MX

SUBJECT: SECRETARY'S INITIATIVE ON DOUBLE TAXATION
TREATIES WITH LATIN AMERICA

REF: STATE 162751; MEXICO 7002

1. FINATT CALLED ON UNDERSECRETARY OF FINANCE FOR TAXATION, GUSTAVO PETRICCIOLI, TO OBTAIN MEXICAN VIEWS ON POSSIBILITY OF NEGOTIATING DOUBLE TAXATION TREATY. HE SAID THAT MEXICO DID NOT WANT TO NEGOTIATE A GENERAL TAX TREATY AT THIS TIME BUT SAID IT WOULD BE INTERESTED IN NEGOTIATING AGREEMENTS ON SPECIFIC POINTS. HE SAID THIS WAS POLICY MEXICO HAS ADOPTED IN TALKS WITH JAPAN, GERMANY, FRANCE AND CANADA AND CITED AGREEMENT ON AIR AND SEA TRANSPORT AS EXAMPLE.

2. IN RESPONSE TO QUERY AS TO WHAT MAY INTEREST U.S. TAX OFFICIALS, FINATT MENTIONED POSSIBILITY OF EXCHANGE OF INFORMATION AND ACCESS TO INFORMATION TO MEXICO AS BEING OF PARTICULAR CONCERN. PETRICCIOLI SAID THIS COULD REQUIRE NEW LAWS.

3. PETRICCIOLI INDICATED A WILLINGNESS AND DESIRE TO HAVE TALKS WITH U.S. OFFICIALS REGARDING POSSIBLE AREAS FOR AGREEMENT, BUT STRESSED THAT SUCH TALKS SHOULD BE INFORMAL AND PRIVATE. HE ALSO SAID THAT IF U.S. WOULD
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LIKE TO HAVE SUCH TALKS HE WOULD LIKE TO RECEIVE A LIST

OF ITEMS TO BE DISCUSSED PRIOR TO SUCH A MEETING.

4. WOULD APPRECIATE WASHINGTON REACTION TO PETRICCIOLI'S
PROPOSAL FOR INFORMAL DISCUSSIONS. PETRICCIOLO DID NOT
WANT POSSIBILITY OF INFORMAL TALKS RAISED OUTSIDE OF
GOVERNMENT.
JOVA

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